

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIANE RECZEK,	:	
	Plaintiff,	:
		:
v.	:	CIVIL ACTION NO: 07-00013 (GMS)
	:	
JHA WILMINGTON, INC.,	:	
	:	
	Defendants.	:

MOTION FOR DEFAULT JUDGMENT

1. Plaintiff, Diane Reczek, obtained a default against defendant, JHA Wilmington, Inc., on July 3, 2007.
2. Plaintiff hereby requests the entry of a Default Judgment against Defendant for Back Pay, Front Pay, Emotional Distress, Punitive Damages, Costs & Attorney's Fees, in amounts to be determined by the court.

LAW OFFICES OF G. KEVIN FASIC

/s/ G. Kevin Fasic
G. Kevin Fasic, Esquire (DE 3496)
Legal Arts Building
1225 King Street, Suite 200
Wilmington, DE 19801
(302) 654-4501

Attorney for Plaintiff

DATE: July 26, 2007

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIANE RECZEK,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION NO: 07-00013 (GMS)
	:	
JHA WILMINGTON, INC.,	:	
	:	
Defendants.	:	

NOTICE OF MOTION

NOTICE:	JHA Wilmington, Inc. d/b/a Tilton Terrace 801 N. Broom Street Wilmington, DE 19801	JHA Wilmington, Inc. c/o Red Oak Healthcare Management 2800 Wildwood Avenue Jackson, MI 49202
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PLEASE TAKE NOTICE that the undersigned will present the attached *Motion for Default Judgment* at the earliest convenience of the Court.

LAW OFFICES OF G. KEVIN FASIC

/s/ G. Kevin Fasic
G. Kevin Fasic, Esquire (DE 3496)
Legal Arts Building
1225 King Street, Suite 200
Wilmington, DE 19801
(302) 654-4501

Attorney for Plaintiff

DATE: July 26, 2007

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Plaintiff, :
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JHA WILMINGTON, INC., :
: :
Defendants. :
:

CERTIFICATE OF SERVICE

I, G. KEVIN FASIC, ESQUIRE, hereby certify this 26th day of July, 2007, that I caused a true and correct copy of the foregoing Motion for Default to be served, via First Class U.S. mail, postage prepaid, upon the following:

JHA Wilmington, Inc.
d/b/a Tilton Terrace
801 N. Broom Street
Wilmington, DE 19801

JHA Wilmington, Inc.
c/o Red Oak Healthcare Management
2800 Wildwood Avenue
Jackson, MI 49202

Erica N. Finnegan, Esquire
Cross & Simon, LLC
913 North Market Street, 11th Floor
Wilmington, DE 19801

/s/ G. Kevin Fasic
G. Kevin Fasic, Esquire (DE 3496)